

Ilan D. Scharf, Esq. (NY Bar No. 4042107)  
Jason S. Pomerantz, Esq. (Admitted *pro hac vice*)  
Gail S. Greenwood, Esq. (Admitted *pro hac vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777

*Counsel to Plaintiff RDC Liquidating Trust*

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC  
LIQUIDATING TRUST,

Plaintiff,

v.

Adv. Proc. No. 22-02073 (PRW)

LAURENCE F. DOUD III, DONALD ARTHUR,  
STEPHEN GIROUX, CHRISTOPHER CASEY,  
GARRY MROZEK, RICHARD KLENK,  
SHERWOOD KLEIN, JOSEPH LECH, BORIS  
MANTELL, JOSEPH SCOTT MISKOVSKY, and  
PAUL PAGNOTTA, individually as members of the  
Debtor's Board of Directors,

Defendants.

**STIPULATION EXTENDING TIME TO ANSWER COMPLAINT**

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC

("Plaintiff"), successor in interest to Rochester Drug Co-Operative, Inc., and defendants, Garry

Mrozek, Joseph Lech, Boris Mantell, and Joseph Scott Miskovsky (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate:

WHEREAS, on March 8, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendants, and the summons (the “Summons”) was issued on March 9, 2022; and

WHEREAS, on or after March 9, 2022, Defendants were served with the Summons and Complaint.

NOW THEREFORE, the Parties stipulate and agree as follows:

1. Subject to this Court’s approval, the time by which Defendants are required to answer or otherwise respond to the Complaint is extended through and including **April 30, 2022**.
2. Defendants do not challenge personal jurisdiction and waive any objection to service of process of the Summons and Complaint in this adversary proceeding.

Respectfully submitted,

Dated: March 30, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

Ilan D. Scharf (NY Bar No. 4042107)  
Jason S. Pomerantz  
Gail S. Greenwood  
780 Third Avenue, 34th Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Email: bsandler@pszjlaw.com  
ischarf@pszjlaw.com  
jspomerantz@pszjlaw.com

*Counsel to Plaintiff RDC Liquidating Trust*

Dated: March 31, 2022

BRENNAN MANNA DIAMOND

 (Pro Hac Vice forthcoming)  
Kathryn E. Hickner (NY Bar No. 4883302)  
W.D.N.Y Admission Expected April 13, 2022  
Amanda L. Waesch (OH Bar No. 0083949)  
*Pro Hac Vic Forthcoming*  
Bryan Meek (OH Bar No. 0093554)  
*Pro Hac Vic Forthcoming*  
75 E. Market Street  
Akron, OH 44308  
Telephone: (330) 253-5060  
Email: kehickner@bmdllc.com  
alwaesch@bmdllc.com  
bmeek@bmdllc.com  
*Counsel to Defendants Garry Mrozek, Joseph Lech, Boris Mantell, and Joseph Scott Miskovsky*

SO ORDERED:

DATED: \_\_\_\_\_, 2022  
Rochester, New York

\_\_\_\_\_  
HON. PAUL R. WARREN  
United States Bankruptcy Judge